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October 28, 2024

**VIA ECF**

Hon. Miroslav Lovric  
United States District Court  
Northern District of New York  
15 Henry Street  
Binghamton, New York 13901

RE: *Adirondack Trust Company v. Maha Laxmi Corp., et al.*,  
No. 1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Lovric,

As you are aware, this firm represents Defendants in the above-referenced litigation. We write in response to the conference held with the Court on Friday, October 25, 2024 and pursuant to the Court's directive to provide a status update regarding the Wikipedia issues outlined by Plaintiff at Docket No. 111. Counsel for Plaintiff and Defendants met and conferred on October 28, 2024. The parties agreed that Defendants would submit to Plaintiff a sworn affidavit containing Mr. Patel's sworn assertion that he has no involvement in the conduct described in Docket No. 111. Defendants will promptly provide this affidavit to Plaintiff.

Respectfully submitted,

*William S. Nolan*

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